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ATTORNEYS FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JOSHUA CHATWIN,

Plaintiff,

v.

DRAPER CITY; OFFICER J. PATTERSON,
in his individual and official capacity;
OFFICER DAVID HARRIS, in his individual
and official capacity; OFFICER HEATHER
BAUGH, in her individual and official
capacity; and JOHN DOES 1-10,

Defendants.

**DEFENDANTS' RULE 34 REQUEST FOR
ENTRY ONTO PREMISES**

Civil No. 2:14-cv-00375
Judge Dale A. Kimball

Pursuant to Rule 34(a)(2) of the Federal Rules of Civil Procedure, Defendants hereby request entry onto property controlled by Plaintiff, namely, the front driveway and front yard of the property located at 12534 South 150 East, Draper, Utah, so that Defendants, their representatives, employees, and other individuals retained by Defendants, may inspect, measure, survey, and photograph the property. Defendants wish to enter the property on February 11,

2016, beginning at 10:00 a.m. and continuing until complete. This entry will include the temporary placement of one or more vehicles and persons in the front driveway of the property in order to recreate the placement of the vehicles and persons during the incident of May 18, 2010. Pursuant to Rule 34(2), Plaintiff must respond to this request in 30 days and state that the entry will be permitted or state the grounds for objecting to this request.

DATED this 5th day of January, 2016.

DURHAM JONES & PINEGAR, P.C.

/s/ R. Blake Hamilton

R. Blake Hamilton

Ashley M. Gregson

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the **DEFENDANTS' RULE 34 REQUEST FOR ENTRY ONTO PREMISES** was served this 5th day of January, 2016, via email, upon the following:

Lisa A. Marcy
CLYDE SNOW & SESSIONS
One Utah Center, Thirteenth Floor
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Salt Lake City, UT 84111

John K. Johnson
JOHN K. JOHNSON, LLC
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/s/ Sarah Peck